

# **EXHIBIT L**

UNITED STATES BANKRUPTCY COURT  
 WESTERN DISTRICT OF WASHINGTON - TACOMA

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|                            |   |                       |
|----------------------------|---|-----------------------|
| SARAH HOOVER,              | ) |                       |
| Debtor.                    | ) | BK No. 19-42890-MJH   |
| -----                      | ) | Adv. No. 20-04002-MJH |
| SARAH HOOVER,              | ) |                       |
| Plaintiff,                 | ) |                       |
| vs.                        | ) |                       |
| QUALITY LOAN SERVICE       | ) |                       |
| CORPORATION OF WASHINGTON, | ) |                       |
| et al.,                    | ) |                       |
| Defendants.                | ) |                       |

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DEPOSITION UPON ORAL EXAMINATION

OF

QUALITY LOAN SERVICE CORPORATION OF WASHINGTON

DESIGNEE: JEFF STENMAN

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10:00 a.m.

July 7, 2020

787 Maynard Ave. S., Suite 201

Seattle, Washington

REPORTED BY: Lauren G. Harty, RPR, CCR #2674

SEATTLE DEPOSITION REPORTERS, LLC

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## 1 A P P E A R A N C E S

2

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10 FOR DEFENDANT QUALITY LOAN SERVICE CORPORATION OF

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17 FOR DEFENDANT PHH MORTGAGE CORPORATION, HSBC BANK USA,  
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## 1 A P P E A R A N C E S

2 (Continued)

3

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## 1 E X A M I N A T I O N

2 ATTORNEY PAGE

3 BY MS. HENRY: 6

4 BY MR. JOE McINTOSH: 97

5 BY MR. JOHN McINTOSH: 102

## 6 E X H I B I T I N D E X

7 EX# DESCRIPTION PAGE

8 1 5/15/2020 "NOTICE OF DEPOSITION OF 7

9 QUALITY LOAN SERVICE CORP OF WASHINGTON."

10 2 6/8/2020 "QUALITY LOAN SERVICE CORP. OF 7

11 WASHINGTON'S RESPONSE TO PLAINTIFF'S

12 FIRST SET OF INTERROGATORIES AND REQUESTS

13 FOR PRODUCTION."

14 3 Comments, QWA000001-24. 17

15 4 Research results, QWA002219. 32

16 5 Public Records - Search Results, 35

17 QWA002221-2225.

18 6 Person Search, QWA002228. 35

19 7 Lexis search results, QWA002229. 35

20 8 LexisNexis search results, 35

21 QWA002205-2206.

22 9 LexisNexis CourtLink - Docket Number 36

23 Search Result, QWA001715-1716.

24 10 9/17/2019 letter to IH6 Property 65

25 Washington L.P. from QLS, QWA001649-1652.

## E X H I B I T I N D E X

| EX# | DESCRIPTION  | PAGE |
|-----|--|------|
| 11  | Email thread ending 12/2/2019 from Robert McDonald to Michael Lappano, QWA001807-1815. | 72   |
| 12  | QLS Log of Withheld Communications.  | 75   |
| 13  | 12/30/2019 "DECLARATION OF JEFF STENMAN."  | 80   |

1 interested party so that they don't get full borrower  
2 notices.

3 Q. And you refer to them as borrowers?

4 A. They are entered into the system as a  
5 borrower so that they get the mailings that a borrower  
6 would get. If they're entered into an interested  
7 part -- as an interested party, they would only get  
8 those notices that interested parties get. An example  
9 would be a borrower would get an NOD. An interested  
10 party would not. An interested party would get the  
11 notice of sale, but the borrower would get the notice  
12 of sale and the notice of foreclosure.

13 Q. Okay.

14 So what other purposes do you use the report  
15 for?

16 A. This is only used for the deceased  
17 borrower's search.

18 Q. And once you have the deceased borrower's  
19 research social security numbers, what do you use them  
20 for?

21 A. So if they're entered as a party that's been  
22 confirmed of a spouse -- a parent, spouse, or child,  
23 then we do want to run the social security under --  
24 for bankruptcy and SCRA military searches and --  
25 because if we get a bankruptcy hit or a military

1 search hit, we want to review it.

2 Q. Okay.

3 So -- and were searches done in this case  
4 under Ms. Hoover's social security number?

5 A. On -- from the social security number and  
6 results, yes.

7 Q. And -- what -- what do you mean by that?  
8 I'm sorry?

9 A. For the number that I entered in those  
10 results, yes, they were done -- there were searches  
11 done --

12 Q. And --

13 A. -- yes.

14 Q. -- you used what number?

15 A. Well, it's redacted, so I don't know the  
16 full number.

17 Q. But you used the number on the front page of  
18 this report?

19 A. Yes, ma'am.

20 Q. And did you look through the other documents  
21 to see -- do you ever run the second social security  
22 number?

23 A. I did not review those documents.

24 Q. And -- why not?

25 A. At the time that I entered the research



1 talking about your comment notes?

2 A. Yeah, because I have -- I think it's in  
3 there.

4 Q. So why don't I have you look at Exhibit 3,  
5 which are the comments notes, to refresh your memory.

6 A. September 24th, 2019.

7 Q. Okay.

8 And who informed you about the bankruptcy  
9 filing?

10 A. David Miller with Elite Legal Network.

11 Q. Were you ever informed by any other party  
12 about her bankruptcy filing?

13 A. Prior to that date? No.

14 Q. What about after that date?

15 A. For QLS? I -- there was a subsequent call  
16 regarding a -- well, I'll just walk through it. So  
17 the bankruptcy department that we sent the bankruptcy  
18 filing to reviewed it. We received a -- on the 25th  
19 our reception received a call from a third party  
20 regarding the -- well, that's not bankruptcy.

21 Oh. David Miller called us again on the  
22 25th, September 25th. Sarah Hoover called us on  
23 October 3rd.

24 Q. Okay.

25 A. I think that's it.

1 A. No.

2 Q. Were there any other parties that  
3 communicated with the third-party purchaser besides  
4 Mr. McDonald? At --

5 A. Not --

6 Q. -- QLS.

7 A. -- that I'm -- not that I'm aware of.

8 Q. Okay.

9 A. Well -- I would supplement that. When you  
10 say communicated, we would send them the deed as part  
11 of our process --

12 Q. Okay.

13 A. -- and that's communication, but not  
14 regarding this issue.

15 Q. Okay.

16 And --

17 MS. HENRY: Now what exhibit are we on now?

18 THE REPORTER: 10.

19 MS. HENRY: No. 10.

20 (Marked Deposition Exhibit No. 10.)

21 Q. (By Ms. Henry) Can you tell me what is  
22 Exhibit 10.

23 A. It's the cover letter to us sending the  
24 unrecorded trustee's deed to the third-party  
25 purchaser.

1 Q. Okay.

2 And you -- can you tell me what is the date  
3 of that letter?

4 A. September 17.

5 Q. And can you tell me -- do you recall the  
6 date of the trustee -- nontraditional trustee sale?

7 A. I have to look at the document here. It's  
8 in here.

9 Q. Here it is.

10 A. September 13th.

11 Q. And on September -- September 13th this  
12 property was purchased by a third party, correct?

13 A. Yes.

14 Q. Okay.

15 And -- and the third-party purchaser is  
16 IH6 Property Washington, LP, correct?

17 A. Yes.

18 Q. And have you communicated with anybody at  
19 IH6 outside of this letter communication?

20 A. Our in-house counsel may have.

21 Q. Okay.

22 And this trustee's deed was sent or this  
23 cover letter four days after the sale. Can you tell  
24 me why it was sent four days after the sale.

25 A. When the proceeds are received from the sale

1 Q. Right there.

2 A. Right here?

3 Q. Yep. No. 13.

4 So I'm going to take you to Exhibit -- or  
5 page three of that declaration, paragraph 10.

6 A. Yes.

7 Q. You said Quality did not have knowledge or  
8 notice of the bankruptcy at the time of the sale,  
9 correct?

10 A. Correct.

11 Q. You also said that on September 17th you  
12 delivered to a third-party purchaser, IH6, the  
13 trustee's deed, correct?

14 A. Correct.

15 Q. And then number 12., you said you were  
16 notified for the first time on September 24th after  
17 the trustee's deed had already been issued of Sarah  
18 Hoover's bankruptcy, correct?

19 A. Yes.

20 Q. So looking at this communication and your  
21 comment notes, did QLS make any -- notify PHH --  
22 QLS -- I mean PHH, IH6, or the Bankruptcy Court upon  
23 learning of her bankruptcy on September 24th?

24 A. I don't -- I don't recall. I don't think we  
25 did. I --

1 Q. Well --

2 A. -- don't recall.

3 Q. -- is there anywhere else you would look?

4 A. I'd have to go -- I'd have to look in the  
5 LPS to see if we did anything with it. I don't think  
6 we did, but I'd -- I'd have to look to verify --

7 Q. And is there --

8 A. -- as far as notification to -- to PHH.

9 Q. And you're looking at Exhibit 3, which  
10 you've testified about before. You said this had all  
11 the important information from LPS in it, correct?

12 A. Yeah. That would be communication between  
13 us -- most likely it would be communication from them  
14 to us.

15 Q. And what about communications from you to  
16 them?

17 A. Well, if there aren't any, then we wouldn't  
18 have put them in here, but --

19 Q. So is the --

20 A. If --

21 Q. -- absence --

22 A. -- you understand LPS, when you're in and  
23 there's a template, you've already reported the sales  
24 report, that's the end of the template. So there's  
25 really no more communication after that unless

1 something comes up. If -- my rec -- it's my  
2 recollection that we looked at the bankruptcy,  
3 couldn't confirm her interest in the property, and  
4 came to the conclusion that the bankruptcy didn't  
5 apply. I don't think I would notify PHH of a  
6 bankruptcy that didn't apply. That's my recollection.

7 Q. So your recollection is that you didn't give  
8 them any information about the bankruptcy?

9 A. My recollection is that at the time that we  
10 learned of it I don't believe we notified PHH of the  
11 bankruptcy.

12 Q. Okay.

13 And is there a way that you can confirm or,  
14 as your counsel stated, have you supplied --

15 A. I'd have to look in --

16 Q. -- all the information?

17 A. I'd have to look in the LPS notes to see if  
18 anything else was launched. I don't -- I don't recall  
19 that there was anything launched, but I'd still have  
20 to check those notes.

21 Q. And is there a reason --

22 A. That's not in our system.

23 Q. Is there a reason why a note like that would  
24 not be in the comment notes?

25 A. No. I don't think there would be a reason

1 MR. JOSEPH McINTOSH: And it's Exhibit 13.

2 A. Yes. Page 13.

3 MR. JOHN McINTOSH: All right. That's all I  
4 have. Thank you.

5 MS. HENRY: I have --

6 MR. JOSEPH McINTOSH: All right.

7 MS. HENRY: -- nothing else.

8 MR. JOSEPH McINTOSH: We're done.

9 (Deposition recessed at 12:06 p.m.)

10 (Signature reserved.)

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1 S I G N A T U R E

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3 I declare under penalty of perjury under the  
4 laws of the State of Washington that I have read my  
5 within deposition, and the same is true and accurate,  
6 save and except for changes and/or corrections, if  
7 any, as indicated by me on the CHANGE SHEET flyleaf  
8 page hereof.

9 Signed in \_\_\_\_\_, Washington, this  
10 \_\_\_\_\_ day of \_\_\_\_\_, 2020.

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14 \_\_\_\_\_  
DESIGNEE: JEFF STENMAN

15 Taken: July 7, 2020

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24 Re: In re: Sarah Hoover  
Cause No.: 19-42890-MJH, 20-04002-MJH  
25 Lauren G. Harty, RPR, CCR #2674



## C E R T I F I C A T E

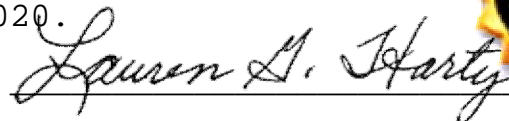
STATE OF WASHINGTON       )  
  ) ss.  
COUNTY OF KING           )

I, the undersigned Washington Certified Court Reporter, hereby certify that the foregoing deposition upon oral examination of DESIGNEE: JEFF STENMAN was taken before me on July 7, 2020, and transcribed under my direction;

That the witness was duly sworn by me pursuant to RCW 5.28.010 to testify truthfully; that the transcript of the deposition is a full, true, and correct transcript to the best of my ability; that I am neither attorney for nor a relative or employee of any of the parties to the action or any attorney or counsel employed by the parties hereto, nor am I financially interested in its outcome;

I further certify that in accordance with CR 30(e), the witness was given the opportunity to examine, read, and sign the deposition within 30 days upon its completion and submission, unless waiver of signature was indicated in the record.

IN WITNESS WHEREOF, I have hereunto set my hand and this 20th day of July, 2020.



LAUREN G. HARTY, CCR #2674

